

Clayman Rosenberg  
Kirshner & Linder LLP

305 Madison Avenue  
New York, NY 10165  
T: 212-922-1080  
F: 212-949-8255

Isabelle A. Kirshner  
Partner  
kirshner@clayro.com

June 7, 2023

BY ECF

Hon. Anne M. Donnelly  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Arkadiy Khaimov  
S1 20 Crim. 580 (AMD)

Dear Judge Donnelly:

We are the attorneys for Arkadiy Khaimov, the above-named defendant. As you are aware, Mr. Khaimov was released on home detention in April 2022. I am writing to request that he be permitted to attend graduation ceremonies of two of his children.

On June 13, 2023, his 13-year-old daughter Levana will be graduating from 8<sup>th</sup> grade from Bnos Malka Academy. The graduation ceremony will take place at Young Israel of Hillcrest, located at 169-07 Jewel Avenue in Flushing, N.Y. at 7:00 p.m. We respectfully request that Mr. Khaimov be permitted to leave his home for 3 hours, which will allow for travel to and from the facility.

On June 14, 2023, Mr. Khaimov's 3-year-old son Elisha is participating in a "step up" ceremony at Forest Park Pre-School, located at 102-35 63<sup>rd</sup> Rd. Forest Hills. The ceremony starts at 2:30 p.m. and we are requesting a two and a half hour allowance for Mr. Khaimov to attend the ceremony.

Written materials relating to these celebrations have been provided to Pre-Trial Services and they have no objection to the request. AUSA Andrew Estes has no objection to this request.

Respectfully submitted,

/s/

ISABELLE KIRSHNER

cc: Andrew Estes (via ECF)